

Donald Charles Dunn, Jr
14408 Varrelman St.
Austin, TX 78725

FILED

2011 NOV 14 PM 5:00

CLERK US DISTRICT COURT
WESTERN DISTRICT OF TEXAS

BY
DEPUTY

DISTRICT COURT OF THE UNITED STATES
WESTERN DISTRICT OF TEXAS

Sarah Doe; Kimberley Doe; and Raquel Doe,) Case No.: 1:11-cv-907 **LY**
on behalf of themselves and all others)
similarly situated,) **ANSWER**
Plaintiff,)
vs.)
Donald Dunn, et al.,
Defendant

COMES NOW the defendant Donald Dunn in answering the allegations of the
Complaint on file herein, affirms and denies the allegations as follows.
Answering allegations of paragraph 1, the Defendant affirms all facts.
Answering allegations of paragraph 2, the Defendant affirms in part based on knowledge
of incident, but denies any of the times before December 2009.
Answering allegations of paragraphs 10-12, Defendant affirms in part based on
knowledge of incident, but denies the substantial injury, Defendant Dunn did not cause
any physical injuries.
Answering allegations of paragraph 25, Defendant affirms in part based on knowledge,
but denies having the title of Escort Officer.
Answering allegations of paragraph 47, Defendant affirms all facts.
Answering allegations of paragraph 71, Defendant affirms in part based on knowledge,
but denies having the title of Escort Officer.

1 Answering allegations of paragraph 72, Defendant affirms all facts.

2 Answering allegations of paragraph 78, Defendant affirms in part based on knowledge,
3 but denies pressing her up against the wall, groping her for an extended amount of
4 time, touching her breasts, crotch area, and buttocks, it was a quick pat down.

5 Answering allegations of paragraph 84, Defendant affirms in part based on knowledge,
6 but denies, groping her for an extended amount of time, denies lifting her bra and
7 fondling her breast, denies touching all over the rest of her body, including her
8 crotch area and buttocks.

9 Answering allegations of paragraph 85, Defendant affirms in part based on knowledge,
10 but denies fondling himself and trying to touch plaintiff.

11 Answering allegations of paragraph 86, Defendant denies this fact.

12 Answering allegations of paragraph 93, Defendant denies this fact.

13 Answering allegations of paragraph 94, Defendant denies this fact.

14 Answering allegations of paragraph 99, Defendant denies this fact.

15 Answering allegations of paragraphs 101-103, Defendant affirms this fact.

16 Answering allegations of paragraphs 104-106, Defendant affirms in part based on
17 knowledge of incident, but denies touching her breasts and buttocks in a sexual
18 manner, in all cases it was a quick pat down.

19 Answering allegations of paragraphs 107-108, Defendant affirms these facts.

20 Answering allegations of paragraph 109, Defendant denies this fact.

21
22 I Donald Dunn did disrespect these women, It was not right nor was it authorized for
23 me to do what I did. I have served my time, I'm in therapy, I'm on probation and I
24 can say this type of behavior will not happen ever again from me.

25
26 WHEREFORE, me the Defendant Donald Dunn pray that you the Plaintiff(s) have mercy upon
27 me and drop the lawsuit against me. I am truly sorry for putting you through this.

Dated this 14th day of November, 2011



Donald Charles Dunn, Jr.
14408 Varrelman St.
Austin, TX 78725

(512) 364-5474

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of (title of document) Answer
was served by (method of delivery) mail
on (date) 11/14/11 to:

Name: ~~Mark~~ Whitburn / Lisa Grayhill

Fax/E-Mail _____

Address: P.O. Box 12905
Austin, TX 78711

Name: _____

Fax/E-Mail _____

Address: _____

Name: _____

Fax/E-Mail _____

Address: _____

Name: _____

Fax/E-Mail _____

Address: _____

Name: _____

Fax/E-Mail _____

Address: _____

Signed Name: Donald Dunn, Jr.

Printed Name: Donald Dunn, Jr.